

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE (G.N.C.)

Plaintiff

v.

Uniquet Delaware LLC, Brookwood Hospitality LLC, Embassy Suites Franchise LLC, Hilton Franchise Holding LLC, Park Hotels & Resorts, Inc., Hilton Domestic Operating Company Inc., Hilton Worldwide Holdings Inc., Vornado Realty Trust, Vornado Realty L.P., 401 Hotel L.P., 401 Hotel General Partner L.L.C., 401 Hotel TRS, Inc., 401 Hotel TRS LLC, 401 Hotel Management Company, L.L.C., Jai Bhole, Inc., and Rudra Management Inc.,

Defendants.

CIVIL ACTION NO.1:23-cv-07980

**NOTICE OF MOTION  
TO PROCEED UNDER PSEUDONYM**

*On an ex parte basis and without prejudice to defendants' right to move to modify this Order, the Court grants plaintiff's motion to proceed by pseudonym. SO ORDERED*

PLEASE TAKE NOTICE that Plaintiff, JANE DOE (G.N.C), through her undersigned *USDT* counsel, respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1) and *9-11-23* Federal Rule of Civil Procedure 5.2, to allow her to proceed in this matter under a pseudonym in her Complaint and all public filings and proceedings in this action. The arguments in support of this motion are set forth in the accompanying Memorandum of Law, which is incorporated herein by reference.

Dated: New York, New York  
September 8, 2023

Respectfully Submitted,

**LOCKS LAW FIRM PLLC**

By: /s/Anthony P. Mastroianni

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